

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

<b>In Re:</b>	:	
Robert W. Campbell	:	<b>Chapter 13</b>
Emily P. Campbell	:	<b>Case No. 23-11293-MDC</b>
Debtors,	:	
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US Bank Trust National Association, Not	:	
In Its Individual Capacity But Solely As	:	
Owner Trustee For VRMTG Asset Trust	:	
Movant,	:	
v.	:	Hearing: September 19, 2023
Robert W. Campbell	:	
Emily P. Campbell	:	
Debtors,	:	
and	:	
Kenneth E. West, Esquire	:	11 U.S.C. §362(d)
Trustee,	:	
Respondents.	:	Related to Docket Number 37

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**STIPULATION RESOLVING  
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

THIS matter being opened to the Court by Brian E. Caine, Esquire, of the law office of Parker McCay P.A., attorney for the secured creditor, US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust, (hereinafter “Movant”), upon a Motion for Relief from the Automatic Stay as to Real Property, more commonly known as 853 Hilton Ave., Feasterville, PA 19053; and Brad J. Sadek, Esquire appearing on behalf of the Debtors, and it appearing that the parties have amicably resolved their differences and for good cause shown;

1. As of September 19, 2023, the post-petition arrears are **\$4,930.16**, which represents payments of \$1,232.54 each due June 1, 2023, July 1, 2023, August 1, 2023, and September 1, 2023.

2. The Debtors agree to reimburse the Movant \$1,038.00 for its attorney fees and costs for prosecution of the within Motion.

3. The Debtors will cure the post-petition arrears of \$4,930.16 and reimburse Movant for the attorney fees and costs of \$1,038.00 by adding \$663.13 to the regular monthly payments each due October 1, 2023 through May 1, 2024. Debtors will add \$663.12 to the regular monthly payment due June 1, 2024.

4. The Debtors will resume regular monthly payment starting with the July 1, 2024 payment, and continuing each month thereafter for the duration of this Chapter 13 proceeding, Debtors shall remit payments directly to Movant as same come due.

5. If the Debtors fail to timely make any of the payments stated herein, then Counsel for Movant may send a notice of default to the Debtors and Debtors' attorney with a right to cure the default. If the Default is not cured within fourteen (14) days of said notice to cure, then counsel for the Movant may file a Certification of Default with the Court, and the Court may *immediately* enter an Order granting Movant relief from the automatic stay, as to the mortgaged property herein.

*The undersigned hereby consent to the form and entry of the within Stipulation.*

/s/ Brian E. Caine

Brian E. Caine, Esquire  
Parker McCay P.A.  
9000 Midlantic Drive, Suite 300  
Mount Laurel, NJ 08054  
(856) 985-4059  
bcaine@parkermccay.com  
No Objection

/s/Brad J. Sadek

Brad J. Sadek, Esquire  
Sadek Law Offices, LLC  
1500 JFK Boulevard, Ste 220  
Philadelphia, PA 19102  
(215) 545-0008  
brad@sadeklaw.com

/s/LeeAne O. Huggins

Concurrence by the Chapter 13 Trustee

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2023, it is hereby  
ORDERED

that the foregoing Stipulation is approved, shall be, and is made and Order of this Court.

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Magdeline D. Coleman  
United States Bankruptcy Judge  
Eastern District of Pennsylvania